REMARKS

This is a full and timely response to the final Office Action mailed on October 16, 2008 (part of Paper No./Date 20081010). Upon entry of the foregoing amendments, claim 22 has been amended and claims 1-6 and 11-13, and 15-26 remain pending. Applicants reserve the right to pursue the subject matter of these canceled claims in a continuing application, if Applicants so choose, and do not intend to dedicate any of the canceled subject matter to the public. Reconsideration and allowance of the Application and present claims are respectfully requested.

I.   Rejections under 35 U.S.C. § 112, first paragraph

In item 5 of the Office action, claims 1-6, 11-13 and 15-26 have been rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. The Office action alleges that there does not appear to be a specific disclosure of converting data in XML to non-XML. Applicants respectfully disagree. As one non-limiting example, page 13, line 10 – page 14, line 21 describes exemplary code for **_target object creation_**. In other words, the claimed invention describes transforming object data in XML to non-XML target objects. The non-limiting exemplary code noted above discloses a specification of a process to transform a source object that can be represented by XML data to a target object that can be represented by non-XML data, such as in a Java object, or an object represented by another programming language. The depicted XML code specifies various fields and syntax for such transformation.

As further described in the specification, the exemplary code can be employed to generate a transformation class that can apply an "expression on source data elements and [assign] them to the target object." In the example contained in the above noted portion of the specification, a source object is mapped into a target object array that can be represented in a non-XML programming language. A transformation class performing the transformation can be

subsequently compiled to improve the efficiency of data transformation. Accordingly, Applicants respectfully submit that above noted allegation of the Office action is misplaced, and that the rejection under 35 USC § 112 should be withdrawn.

The Office Action further alleges that dependent claims 4, 13, 20, and 25 identify non-XML application-specific object model types but that the specification discloses application-specific object model types as XML on page 8, lines 8-9 and line 27 of the specification. Applicants again respectfully disagree. The cited portion of Applicants' specification describes a non-limiting ***XML schema*** of an application-specific object model type. Further examination of the disclosed XML schema reveals that it expresses the structure and constraints of a ***non-XML*** application-specific object model type. For example, lines 35-37 of page 8 of the specification discloses certain application-specific constraints of the non-XML object (*e.g.,* element name is "Id" and element type is "integer.") Accordingly, Applicants respectfully request that the rejection of the claims under 35 USC § 112 in this regard also be withdrawn.

II.   Rejections under 35 U.S.C. § 101

In item 7 of the Office action, claims 22-25 have been rejected under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter. Applicants respectfully submit that the rejection is rendered moot by amendment of claim 22.

III.   Rejections under 35 U.S.C. § 103

In item 10 of the Office action, claims 1-6, 11-13, and 15-26 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2002/0120652 filed by Rising et al. (hereafter "*Rising*") in view of U.S. Patent Application Publication No. 2003/0037174 filed by Lavin et al. (hereafter "*Lavin*"). A prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the

claims. MPEP §2143.03, In re Rijckaert, 9 F.3d 1531, 28 U.S.P.Q2d 1955, 1956 (Fed. Cir.

1993).

A.   Independent claim 1

Claim 1 (with emphasis added) recites:

1.   A method of data object transformation between a middleware and a
application, the method comprising:
         receiving a message from a messaging middleware by a data
transformation adapter, the message including one or more data objects in an
eXtensible Markup Language (XML), wherein the message is a first
communications format;
         converting by the data transformation adapter the message from the first
communications format to a second communications format;
         ***converting by the data transformation adapter the one or more data
objects in XML to a non-eXtensible Markup Language (non-XML)***, wherein
the one or more data objects are converted using a first set of one or more
transformation classes, the one or more transformation classes being configured
to transform the one or more data objects in XML to non-XML, each of the one or
more transformation classes generated using mapping rules, ***the mapping rules
including XML based syntax that uses rule specification guide to facilitate
transforming the one or more data objects in XML to non-XML***; and
         transmitting by the data transformation adapter the one or more data
objects in non-XML to an application.

Applicants respectfully submit that *Rising* in view of *Lavin* fails to disclose at least the

above emphasized elements of claim 1. Applicants submit that the cited *Rising* reference

discloses achieving compression of an instance document by associating elements and

attributes of an instance document to various tokens and/or codes to encode an additional

instance document. *See* paragraph 27, *Rising*. This is accomplished via XSLT transformation

as noted in paragraph 32 of the reference. Paragraph 32 states the following:

**An entity, such as server 106, transforms the DDL instance document into
an appropriate ASDL instance document <u>using the published XSLT
document</u>** and binarizes the ASDL instance document using the published
ASDL frequency tables.

In addition, Rising discloses "publishing an XSLT document containing the

transformation functions for mapping into the application specific markup language, and

publishing the frequency tables for the ASDL namespace for access by the clients 102, 104

over a communications network 110." In contrast, claim 1 discloses employing ***mapping rules***

including XML based syntax that uses rule specification guide to facilitate transforming the one or more data objects in XML to non-XML. In other words, the mapping rules facilitate transformation of the data objects to non-XML data without resorting to XSLT transformation and its attendant inefficiencies (*e.g.* due to xpath queries).

Accordingly, a solution according to *Rising* relies on XSLT transformation for transforming a first document into a second document to achieve an overall solution, as a server generating an instance document according to *Rising* must still employ XSLT transformation. However, as previously noted, the claimed invention is an alternative solution for XSLT. As noted in the Background of the application, "XSLT and other existing methods have not fully addressed the issues relating to data transformation in a communications network environment. Accordingly, there remains a need for a method and system device that solves existing shortcoming relating to data transformation." The claimed invention increases performance by transforming object data in XML to non-XML rather than to an XML format as a result of an XSLT transformation. The object data in non-XML can be used in an application programming interface and does not involve run-time interpretation of transformation specification as in XSLT transformation. In contrast to *Rising*, the claimed invention improves the performance of data transformation compared with XSLT transformation by removing XSLT transformation from the data transformation process.

Applicants respectfully assert that *Rising,* like references cited by previous Office actions in the instant application, focuses on a system that uses XSLT transformation to achieve an overall solution. The XSLT transformation transforms a first XML document type into a second XML document type. *Lavin* fails to remedy these deficiencies. Therefore, Applicants respectfully submit that *Rising* in view of *Lavin* fail to teach, disclose, or suggest ***transforming the data objects in XML to non-XML***, as recited in claim 1. Consequently, for at least this reason, among others, Applicants respectfully request that claim 1 be allowed and the rejection be withdrawn.

B.   Independent claims 11, 17, 22 and 26

Applicants respectfully submit that for reasons related to those discussed above, *Rising* in view of *Lavin* fails to teach, disclose, or suggest each and every element of independent claims 11, 17, 22 and 26.

C.   Dependent Claims 2-6, 12-16, 18-21, and 23-25

Because independent claims 1, 11, 17, 22 and 26 are allowable over the cited art of record, dependent claims 2-6, 12-16, 18-21, and 23-25 are allowable as a matter of law for at least the reason that dependent claims 2-6, 12-16, 18-21, and 23-25 contain all features and elements of their respective independent base claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988). Accordingly, the rejection to dependent claims 2-6, 12-16, 18-21, and 23-25 should be withdrawn for at least this reason, among others.

CONCLUSION

It is believed that all pending claims are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

Respectfully submitted,

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